

Document Log Item

Addressing			
From		To	
Adam Freedman/R9/USEPA/US		George Robin/R9/USEPA/US@EPA Nancy Rumrill/R9/USEPA/US@EPA George Robin/R9/ USEPA/US, Nancy Rumrill/R9/USEPA/US	
CC		BCC	
Description			Form Used: Memo
Subject		Date/Time	
Fw: CO2 Injection Well - State Primacy		09/09/2009 02:31 PM	
# of Attachments	Total Bytes	NPM	Contributor
0	6,762		
Processing			
Comments			

Body

Document Body

Nancy and George--

Deliberative Ex. (b)(3)

-Adam

----- Forwarded by Adam Freedman/R9/USEPA/US on 09/09/2009 02:28 PM -----

From: "Chan, Victor M." <VMChan@SolanoCounty.com>
To: Adam Freedman/R9/USEPA/US@EPA
Cc: "Bell, Jeffery" <JBell@solanocounty.com>, "Leland, James H." <JHLeland@SolanoCounty.com>, "Profant, Michael E." <MEProfant@SolanoCounty.com>, "Cliche, David W." <DWCliche@SolanoCounty.com>, "Kaltreider, Misty C." <MKaltreider@solanocounty.com>, "Burton, Nicholas S." <NSBurton@SolanoCounty.com>, "Schram, Stanley J." <SJSchram@SolanoCounty.com>, "Laughlin, James W." <JWLaughlin@SolanoCounty.com>
Date: 09/09/2009 01:51 PM
Subject: CO2 Injection Well - State Primacy

Adam

We had a planning meeting on the CO2 Injection Well this morning. You should be aware that there may be some conditions with the Solano County's Use Permit.

One issue that came up during today's meeting is about jurisdiction and enforcement on this relatively new program.

According to the EPA homepage on state primacy located at: <http://www.epa.gov/safewater/uic/primacy.html> The State of California is a "joint primacy state" for the UIC program which need clarification. I also have the following questions for the US EPA:

1. Once you issue your EPA permit, who is responsible for enforcement of the EPA's permit conditions? (i.e. will EPA enforce the permit conditions or is enforcement delegated to California?)
2. Will your EPA permit invoke the "proposed" EPA requirements for Geological Sequestration of CO2 (EPA 816-F-08-032) that is now undergoing public review?
3. Can I get a DRAFT of your EPA permit? I would like to coordinate the EPA's requirements with the county requirements to ensure no conflict, avoid duplication and ensure completeness.

Victor M Chan, PE, BCEE

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